



Patricia Kakalec
Patricia@KakalecLaw.com

February 20, 2025

Via ECF

Hon. Gregory S. Woods
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/21/25
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MEMORANDUM ENDORSED

Re: *Benavidez v. Joy Construction Corp.*, Civ. No. 24-CV-9876-GHW

Dear Judge Woods:

Our firm represents Plaintiff Ericka Benavidez in the above-referenced case, which is scheduled for a preliminary conference with the Court next week, on February 27, 2025.

I am writing to request that the February 27, 2025 conference be adjourned, as the Defendants have not yet responded to Plaintiff's Complaint and the parties have not been able to confer as required about a proposed civil case management plan. The response of Defendants Joy Construction Corp. and Novrus Shira, who signed waiver of service forms, are due on March 25, 2025. The responses of the other Defendants, who were served via the Secretary of State, are due on February 21, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patricia Kakalec".

Patricia Kakalec
Counsel for Plaintiff

Application granted. Plaintiff's February 20, 2025 request to adjourn the initial pretrial conference, Dkt. No. 19, is granted. The initial pretrial conference scheduled for February 27, 2025 is adjourned to March 27, 2025 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court's December 23, 2024 order are due no later than March 20, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 19.

SO ORDERED.

Dated: February 21, 2025
New York, New York

A handwritten signature in black ink, appearing to read "Gregory H. Woods".

GREGORY H. WOODS
United States District Judge

Kakalec Law PLLC
80 Broad Street, Suite 703, New York, NY 10004
(212) 705-8730; (646) 759-1587 (fax)
www.KakalecLaw.com